REMARKS

Claims 1-29 are pending in the present application. In the Office Action, claims 14 and 15 were rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for allegedly failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In particular, the Examiner alleges that the limitations "said multiple wireless technologies" lack antecedent basis. Independent claim 1 has been amended to recite "a network operating according to multiple wireless technologies." Thus, Applicant respectfully submits that the limitations of claims 14 and 15 have proper antecedent basis and requests that the Examiner's rejections be withdrawn.

In the Office Action, claims 1-3, 6-7, 10-11, 15, 18-20, 23-25, and 28-29 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Corriveau, et al (U.S. Patent No. 5,918,177). Claims 4-5, 13-14, and 21-22 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Corriveau in view of La Medica, et al (U.S. Patent No. 6,625,451). Claims 8-9, 16-17, and 26-27 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Corriveau in view of Lamb, et al (U.S. Patent No. 6,697,620). Claim 12 was rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Corriveau in view of Lamb and further in view of De Oliveira (U.S. Patent No. 6,763,004). The Examiner's rejections are respectfully traversed.

Independent claims 1 and 18 set forth an apparatus and a method, respectively, for wirelessly paging a mobile device using a network operating according to multiple wireless technologies based at least in part on a technological capability of the mobile device. Claims 1 and 18 also set forth, among other things, determining whether the wireless technology of the mobile unit corresponds to at least one of the multiple wireless technologies of the network

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based on the accessed information and generating a paging request for the mobile device that is based at least partially on the technological capability of the mobile device when the wireless technology of the mobile unit corresponds to at least one of the multiple wireless technologies of the network. As defined in the specification, wireless technologies are the technologies used to support wireless communications between mobile devices and networks. Wireless technologies include personal communications services (PCS) and cellular telecommunication systems. See, e.g., Patent Application, page 2, Il. 25-31. Thus, one example of a network operating according to multiple wireless technologies could be a network operating according to personal communications services (PCS) technology and cellular telecommunication technology.

Corriveau describes a mobile switching center (MSC) for wirelessly paging a mobile device based on the mobile device's expected service type. For example, some mobile devices may only be capable of receiving voice services, and not asynchronous data services and/or facsimile services. Thus, Corriveay describes modifying pages from the mobile switching centers to include service codes that indicate the service type (e.g. voice service, asynchronous data service, facsimile service) for the call. However, Corriveau fails to describe or suggest paging a mobile device using a network operating according to multiple wireless technologies. Furthermore, Corriveau does not describe or suggest determining whether the wireless technology of the mobile unit corresponds to at least one of the multiple wireless technologies of the network based on the accessed information. Corriveau further fails to describe or suggest generating a paging request for the mobile device that is based at least partially on the technological capability of the mobile device when the wireless technology of the mobile unit corresponds to at least one of the multiple wireless technologies of the network.

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For at least the aforementioned reasons, Applicants respectfully submit that the present invention is not anticipated by Corriveau. Applicants request that the Examiner's rejections of claims 1-3, 6-7, 10-11, 15, 18-20, 23-25, and 28-29 under 35 U.S.C. 102(b) be withdrawn.

Moreover, it is respectfully submitted that the pending claims are not obvious in view of the cited references, either alone or in combination. To establish a *prima facie* case of obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. As discussed above, Corriveau fails to describe or suggest many of the features of the present invention. In particular, Corriveau is completely silent with regard to paging a mobile device using a network operating according to multiple wireless technologies.

La Medica describes techniques for wireless telecommunication using dual-mode phones that may operate in an analog mode or a digital mode. The dual-mode phones may be used by a subscriber to a personal communications system service provider. Alternatively, the dual-mode phones may be used by a subscriber to a cellular service provider. See La Medica, col. 7, ll. 25-26. However, La Medica is completely silent with regard to paging a mobile device using a network operating according to multiple wireless technologies. Accordingly, La Medica fails to describe or suggest determining whether the wireless technology of the mobile unit corresponds to at least one of the multiple wireless technologies of the network based on the accessed information. La Medica also fails to describe or suggest generating a paging request for the mobile device that is based at least partially on the technological capability of the mobile device when the wireless technology of the mobile unit corresponds to at least one of the multiple wireless technologies of the network.

The Examiner relies upon Lamb to describe storing a user profile of the mobile device in a Home Location Register of a mobile switching center. The Examiner also relies upon De

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Oliveira to describe broadcasting a page in a last cell in which the mobile device being paged was registered with the network. However, neither Lamb and or De Oliveira remedy the aforementioned deficiencies of Corriveau and La Medica.

For at least the aforementioned reasons, Applicant respectfully submits that the present invention is not obvious over the cited references, either alone or in combination. Applicant requests that the Examiner's rejections of claims 4-5, 8-9, 12-14, 16-17, 21-22, and 26-27 under 35 U.S.C. 103(a) be withdrawn.

For the aforementioned reasons, it is respectfully submitted that all claims pending in the present application are in condition for allowance. The Examiner is invited to contact the undersigned at (713) 934-4052 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,

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